

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 23-cr-80219-AMC

UNITED STATES OF AMERICA

v.

MICHAEL GORDON DOUGLAS,  
a/k/a “DaddyBreendsFam,”  
a/k/a “Michael,”

Defendant.

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UNITED STATES OF AMERICA’S NOTICE OF INTENT TO ADMIT EVIDENCE  
PURSUANT TO FEDERAL RULES OF EVIDENCE 902(11) AND 803(6) AND (7)

The United States of America files this notice of intent to admit evidence through Federal Rules of Evidence (“FRE”) 902(11) and 803(6) and (7), and states the following in support thereof:

Pursuant to Federal Rule of Evidence 902, the following are “self-authenticating,” that is, “they require no extrinsic evidence of authenticity in order to be admitted”:

*Certified Domestic Records of a Regularly Conducted Activity.* The original or a copy of a domestic record that meets the requirements of Rule 803(6)(A)-(C), as shown by a certification of the custodian or another qualified person that complies with a federal statute or a rule prescribed by the Supreme Court. Before the trial or hearing, the proponent must give an adverse party reasonable written notice of the intent to offer the record — and must make the record and certification available for inspection — so that the party has a fair opportunity to challenge them.

Fed. R. Evid. 902(11).

Pursuant to Federal Rule of Evidence 803, “the following are not excluded by the rule against hearsay, regardless of whether the declarant is available as a witness:”

*Records of a Regularly Conducted Activity.* A record of an act, event, condition, opinion, or diagnosis if: (A) the record was made at or near the time by—or from information transmitted by—

someone with knowledge; (B) the record was kept in the course of a regularly conducted activity of a business, organization, occupation, or calling, whether or not for profit; (C) making the record was a regular practice of that activity; (D) all these conditions are shown by the testimony of the custodian or another qualified witness, or by a certification that complies with Rule 902(11) or (12) or with a statute permitting certification.

Fed. R. Evid. 803(6)–(7).

Attached to this Notice is a Business Record Certification Form filled out by the records custodian or other qualified person. Copies of the certified records the State intends to admit at trial or hearing have been provided in discovery.

Respectfully submitted,

HAYDEN P. O'BYRNE  
UNITED STATES ATTORNEY

By: s/ Justin Chapman  
Justin Chapman  
Assistant United States Attorney  
FL Bar No. 85778  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 16, 2025, I filed the foregoing document with the Clerk of the Court using CM/ECF and sent a copy of the document and its attachments via USAfx to **Scott Berry**, attorney for Defendant.

s/ Justin Chapman  
Justin Chapman  
Assistant United States Attorney

4/16/25, 11:04 PM

Certificate of authenticity.html



**This is an official communication from Amazon.**

**Certificate of Authenticity**

CRIM1405392 2025 DS (External Case No. WP07QR24WP0001)

I, Chelsey Johnson, declare as follows:

1. I am an employee of Amazon, Inc. ("Amazon"). I make this declaration based on personal, firsthand knowledge and, if called and sworn as a witness, I could and would testify as set forth below.
2. Amazon produced documents responsive to the above-referenced law enforcement request.
3. All documents produced by Amazon are authentic, are what they purport to be, and accurately describe the transactions, communications, and events set forth therein.
4. All documents produced by Amazon are business records in that they are (i) records kept in the ordinary course of business; (ii) created at or near the time of the transactions or events reflected therein, or based on information from a person with knowledge of the transaction or events; and (iii) kept as a part of a regular business activity.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 4/11/2025, at Seattle, Washington.

Chelsey Johnson

Law Enforcement Response Specialist

Amazon.com, Inc.

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